

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

**In re: CHRISTINA R. THOMAS, : Chapter 13**  
**Debtor : :**  
**HARLEY-DAVIDSON CREDIT : :**  
**CORP. : Case No. 20-00821**  
**Movant : :**  
**Vs. : :**  
**CHRISTINA R. THOMAS, : :**  
**DAVID E. THOMAS, AND : :**  
**CHARLES J. DEHART, III : :**  
**Respondents : :**

**ANSWER OF DEBTOR TO HARLEY-DAVIDSON CREDIT CORP'S MOTION  
FOR RELIEF FROM STAY & CO-DEBTOR STAY**

AND NOW comes your Debtor, Christina R. Thomas, by and through her counsel, Aaron J. Neuharth, Esquire and Answers Movant's Motion For Relief From Automatic Stay as follows:

1. Admitted.
2. Admitted in part. Denied in part. It is admitted that David E. Thomas, Jr. is a Non-Filing Co-Debtor. It is denied that he resides at 6235 Hager Road, Greencastle, PA 17225.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. (12) Admitted. By way of further answer, the Debtor desires to bring the payments current.
12. (13) Neither admitted nor denied that Movant is seeking relief from the Co-debtor stay. By way of further answer, David E. Thomas, Jr. received a Chapter 7 bankruptcy discharge of the financial obligation under case number 20-00864 on June 22, 2020.

Wherefore, Respondent respectfully requests this Honorable Court deny Movant's Motion based upon Debtor's proof that payments have been submitted to Movant that Debtors have not received credit for.

Date: September 14, 2020

/s/ Aaron J. Neuharth

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